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Attorney for Plaintiff QuickLogic Corporation.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

QUICKLOGIC CORPORATION,

Plaintiff and Counter-Defendant,

v.

KONDA TECHNOLOGIES, INC. AND
VENKAT KONDA,

Defendants and Counter-Plaintiffs.

Case No. 5:21-cv-04657-EJD

**SUPPLEMENTAL DECLARATION OF
SARAH GUSKE IN SUPPORT OF
QUICKLOGIC CORP.'S MOTION FOR
ATTORNEYS' FEES**

Judge: Hon. Edward J. Davila

Date: May 9, 2024

Time: 9:00 a.m.

Courtroom: 4 – 5th Floor

I, Sarah Guske, declare as follows:

1. I am an attorney with the law firm of Baker Botts L.L.P., counsel for Plaintiff QuickLogic Corp. (“QuickLogic”) in the above-captioned matter. I have personal knowledge of the facts stated herein and if called as a witness, I could and would testify thereto.

1. Counsel for QuickLogic met and conferred with counsel for Konda Technologies, Inc. and Venkat Konda (“Defendants”) and with William C. Milks, III, Derek Dahlgren, Deepali Brahmbhatt, and Brian Tollefson on February 16, 2024, for the purpose of attempting to resolve any disputes with respect to QuickLogic’s motion for attorneys’ fees. A true and correct copy of meet-and-confer correspondence from January 25, 2024 to February 22, 2024 is attached as **Exhibit I**.

2. I have reviewed invoices that QuickLogic’s counsel submitted to QuickLogic in this matter. Baker Botts maintains digital copies of these invoices and they were submitted to QuickLogic on a monthly basis (subject to some variations between invoices). Baker Botts maintained billing records for this matter in accordance with its usual practices, and attorneys working on this matter were instructed to enter their time in accordance with firm policies. Baker Botts conducts thorough reviews of each invoice before sending it to QuickLogic to confirm that each entry reflects time appropriately charged to QuickLogic. In instances where an entry reflects time that should not be charged to the client—whether due to a special client arrangement, inefficiencies, or otherwise—the entry is removed from the invoice and is not billed to the client. In the end, each invoice is reviewed by a team of individuals, including attorneys, litigation support staff, and accounting support staff. I have also reviewed pre-bills that are still undergoing review.

3. From my review of the aforementioned invoices and pre-bills, it is my good-faith calculation that, between August 1, 2023 and January 31, 2024, QuickLogic’s attorneys and legal professionals at Baker Botts have spent a total of approximately 155.6 hours on this case, for a total of \$111,731.70 during this period (which accounts for rate and courtesy discounts applied during this period). This total includes time spent on the following tasks:

<u>Task</u>	<u>Hours</u>	<u>Fees</u>
Analyzing the Court’s August 11, 2023 order and preparing a response to the Court’s order to show case regarding	31.2	N/A (reflecting a \$30,103.32 courtesy

<u>Task</u>	<u>Hours</u>	<u>Fees</u>
jurisdiction		discount)
Attempting to meet and confer with opposing counsel regarding QuickLogic's motion for attorneys' fees, and drafting Administrative Motion for Clarification of the Court's August 11, 2023 Order and/or Enlargement of Time (Dkt. 84)	2.1	\$1,447.68
Preparing QuickLogic's Bill of Costs (Dkt. 90) and Motion for Attorneys' Fees (Dkt. 91)	32.0	\$22,621.78 (with \$3,431.78 courtesy discount)
Analyzing the effects of the Court's order granting QuickLogic's Administrative Motion for Clarification of the Court's August 11, 2023 Order and/or Enlargement of Time (Dkt. 92)	0.8	\$847.86
Addressing various motions filed by Defendants and their counsel for a stay (Dkt. 86), for orders extending the time to respond to QuickLogic's attorneys' fees motion (Dkts. 95, 97, & 98), and to withdraw (Dkt. 103)	9.9	\$9,909.51
Preparing for and attending the October 5, 2023 status conference	4.6	\$5,326.23
Preparing QuickLogic's Motion to Enforce Civil Local Rule 3-15 (Dkt. 109)	3.2	\$2,754.57
Preparing QuickLogic's Opposition to Defendants' Request for an Extension to Respond to QuickLogic Corp.'s Administrative Motion for Enforcement of Civil Local Rule 3-15 (Dkt. 111)	1.7	\$938.73
Preparing QuickLogic's Response to Devlin Law Firm's "Notice" to Bifurcate Plaintiff's Attorneys' Fees Motion (Dkt.	3.9	\$4,042.35

<u>Task</u>	<u>Hours</u>	<u>Fees</u>
114)		
Preparing for and attending the November 9, 2023 status conference	3.7	\$4,583.67
Meeting and conferring with Defendants and their counsel regarding schedule for QuickLogic's Motion for Attorneys' Fees	0.9	\$836.94
Reviewing Oppositions to QuickLogic's Motion for Attorneys' Fees filed by Brahmhatt and Dahlgren	2.9	\$3,116.49
Preparing for and attending the December 6, 2023 status conference	9.8	\$10,690.29
Preparing QuickLogic's Motion for Entry of Default and Default Judgment Against Konda Technologies (Dkt. 127)	22.8	\$16,111.68
Drafting QuickLogic's Reply in Support of its Motion for Entry of Default and Default Judgment Against Konda Technologies (Dkt. 130)	12.6	\$12,033.06
Preparing for and attending the January 25, 2024 hearing on QuickLogic's Motion for Entry of Default and Default Judgment Against Konda Technologies	10.5	\$13,128.57
Preparing and meeting and conferring with Defendants and their counsel regarding Joint Statement in Response to the Court's January 25, 2024 Order (Dkt. 140)	3.0	\$3,342.30

These totals do not include time spent after January 31, 2024, including but not limited to the hours spent on QuickLogic's supplemental brief in support of its motion for attorneys' fees.

4. The invoices and pre-bills identify seven attorneys who have worked on this case: Partner G. Hopkins Guy, III, myself (Partner Sarah Guske), Special Counsel John F. Gaustad, and Senior Associate David Lien. The invoices also identify two other legal professionals who have worked on this case: Senior Paralegal Marco Giguere, and Senior Paralegal Larissa Soboleva. The

1 following paragraphs provide my good-faith calculations of the approximate hours worked by these
 2 individuals between August 1, 2023 and January 31, 2024.

3 5. Partner G. Hopkins Guy, III billed approximately 30.9 hours from August 1, 2023
 4 through January 31, 2024. Mr. Guy's charged hourly rate ranged from \$1,318.20 to \$1,407.90 per
 5 hour.

6 6. I (Partner Sarah Guske) billed approximately 22.8 hours from August 1, 2023
 7 through January 31, 2024. My charged hourly rate ranged between \$1,017.90 to \$1,092.00 per hour.

8 7. Special Counsel John F. Gaustad billed approximately 78.8 hours from August 1,
 9 2023 through January 31, 2024. Mr. Gaustad's charged hourly rate ranged from \$904.80 to \$967.20
 10 per hour.

11 8. Senior Associate David Lien billed approximately 2.2 hours from August 1, 2023
 12 through January 31, 2024. Mr. Lien's charged hourly rate was \$834.60 per hour. A true and correct
 13 copy of Mr. Lien's biography from Baker Botts' website
 14 (<https://www.bakerbotts.com/people/l/lien-david>) is attached as **Exhibit J**.

15 9. Senior Paralegal Marco Giguere billed approximately 1.5 hours from August 1, 2023
 16 through January 31, 2024. Mr. Giguere's charged hourly rate was \$339.30 per hour.

17 10. Senior Paralegal Larissa Soboleva billed approximately 21.0 hours from August 1,
 18 2023 through January 31, 2024. Ms. Soboleva's charged hourly rate ranged from \$339.30 to \$358.80
 19 per hour.

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 21 I declare under penalty of perjury under the laws of the United States of America and the
 22 State of California that the foregoing is true and correct.

23 Executed on March 7, 2024 in Ross, California.

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 25 By: /s/ Sarah Guske
 26 Sarah Guske
 27
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